

UNITED STATES OF AMERICA  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554

In The Matter Of: )  
 )  
Creation Of A ) FCC Docket No. RM-  
11287  
Low Power Radio Service )  
On The AM Band )

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WRITTEN COMMENTS OF  
RADIO READY TO GROW (RRTG)

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TABLE OF CONTENTS

	<u>Page</u>
Introduction	
1	
4 Key Points	
2	
The LPAM Petition As A Reasonable <i>Starting Point</i>	
5	
Adding A Part 15 Power Boost To The LPAM Proposed Rule	
6	

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RADIO READY TO GROW (RRTG) is a small, informal, new and nationwide organization of current and former Part 15 AM radio stations.

Speaking for ourselves, we are *ready to grow* into licensed Low Power AM (LPAM) radio stations. We have formed a specialized advocacy group, composed of current and former Part 15 AM radio stations, because the FCC's current deliberations demand the inclusion of more voices that speak strictly from a Part 15 AM perspective.

In FCC Docket RM-11287, the Written and Reply Comments to date clearly demonstrate that the future of Part 15 AM stations is now interwoven with the fate of the proposed LPAM Radio Service. Part 15 AM stations

could be deeply affected by whether or not the Commission chooses to initiate such a Service -- and, if so, how.

RRTG supports, strongly, the establishment of LPAM stations.

Indeed, while we are free to act and speak independently, we are affiliated with THE AMHERST ALLIANCE of Michigan -- which is one of the signatories of the August 19, 2005 Petition For Rulemaking to establish a Low Power AM Radio Service. Amherst's other affiliate organization, THE MICHIGAN MUSIC IS WORLD CLASS! CAMPAIGN, is also a signatory of the recent LPAM Petition.

-2-

#### **4 Key Points**

RRTG raises the following points for consideration by the Commission:

1. As we have stressed already, we *want* to become licensed LPAM stations. We view the proposed Low Power Radio Service as a challenge -- an opportunity -- for Part 15 AM stations, rather than a threat to them.
2. Unlike RANGEMASTER TRANSMITTERS, INC. of North Carolina, we do *not* view the current option of Part 15 AM operations as a full substitute for a Low Power AM Radio Service.

For one thing:

The range of Part 15 AM transmissions, while highly variable, is

generally too small to cover an entire community or even a large neighborhood. To the best of our knowledge, the upper end of the transmission range -- for a Part 15 AM station with excellent technology, based in an area with relatively high ground conductivity -- appears to be 1 to 2 miles. Far more typical, however, is a range of one quarter of a mile to one half of a mile. Even the upper end of the transmission range is not enough to encompass many municipalities, while the broad "middle of the bell-shaped curve" is only enough to cover the tiniest towns and villages and/or the most compact urban neighborhoods.

-3-

In addition:

The option of Part 15 AM multiple transmitters, as suggested by RANGEMASTER TRANSMITTERS, is legally available but prohibitively expensive.

As TALK RADIO OF PAHRUMP has emphasized, in its Reply Comments to RANGEMASTER TRANSMITTERS, multiple transmitters require the construction of multiple towers, the purchase and/or leasing of multiple tower sites, the duplication of equipment and the installation of a microwave signal relay system that would otherwise be unnecessary. It is much less capital-intensive, and also much less labor-intensive, to build a single LPAM station, with a single tower on a single site.

3. We do *not* believe that establishment of a new LPAM Radio Service is inherently inconsistent with the preservation of the Part 15 AM broadcasting option. We assert that the 2 forms of community-focused broadcasting *can* co-exist, given sensible planning by the Commission, and *should* co-exist.
4. Unlike RANGEMASTER TRANSMITTERS, ARSO RADIO CORPORATION of Florida, NEW WORLD BROADCASTING of Florida and MINORITY BROADCASTERS of Florida, we do *not* believe that licensed LPAM stations -- subject to sensible oversight by the FCC -- pose a serious risk of interference with full power radio stations.

-4-

For one thing:

It is ironic indeed to see Written Comments which express grave concern about radio interference on the AM Band -- *without* calling for action to reverse, or at least restrain, the FCC's authorization of the In Band On Channel (IBOC) version of Digital Radio on the AM Band. AM IBOC transmissions are a *proven* source of *disruptive* interference on the AM Band, but RANGEMASTER TRANSMITTERS never mentions the problem. ARSO RADIO CORPORATION, NEW WORLD BROADCASTING and MINORITY BROADCASTERS actually endorse the IBOC version of AM Digital Radio, at least implicitly, by praising the arrival of AM Digital Radio in its present form.

With respect to the IBOC version of AM Digital Radio, the  
Members  
of RADIO READY TO GROW advocate:

- (A) Indefinite continuation of the Commission's current  
moratorium on AM IBOC broadcasts at night,  
*And*
- (B) Initiation of a parallel moratorium on AM IBOC  
broadcasting during the day,  
*Pending*
- (C) Completion of a comprehensive competitive comparison  
between AM IBOC Digital Radio technology and other  
viable choices, including the American-made CAM-D  
technology pioneered by KAHN COMMUNICATIONS.

-5-

To borrow a phrase from the New Testament, those who criticize  
the

*possible* minor impact of LPAM stations, while ignoring or  
endorsing

the *proven* disruptive impact of AM IBOC Digital Radio, are truly  
“straining at the gnat and swallowing the camel”.

Further:

The referenced Docket RM-11287 opponents of LPAM have not

acknowledged the LPAM Petitioners' efforts to address possible risks of interference from LPAM stations -- and they have certainly not presented any constructive alternatives for preventing or managing such possible interference. Instead, they have implicitly advised the FCC to "give up in advance", even though the Commission has been dealing since the 1930's with preventing or managing much higher levels of possible interference from full power stations.

### **The LPAM Petition As A Reasonable *Starting Point***

On the matter of *possible* interference, as on other issues, the LPAM Petitioners designed their Petition to be *a reasonable starting point* for discussion and deliberation. Their goal has been general: The extension of Low Power Radio to the AM Band -- in *a financially sustainable form* which complements, rather than duplicates, the existing Low Power Radio Service on the FM Band. If the Commission and/or commenting parties can "build a better mousetrap" for handling the details of defining and attaining this general goal, the Petitioners will respond with open minds. In the end, of course, the Commission itself will have "the final say".

## Adding A Part 15 Power Boost To The LPAM Proposed Rule

RRTG's Members already favor *one* change as the Commission moves from assessing the LPAM Petition to crafting its own proposed rule:

We agree with RANGEMASTER TRANSMITTERS that the power ceiling

for Part 15 AM stations should be increased to 1 watt, although we see this action as a supplement to -- not a substitute for -- establishment of a new LPAM Radio Service.

We also note that one of the 5 LPAM Petitioners, Nickolaus Leggett N3NL of Virginia, has endorsed a boost to 1 watt in his individual Written Comments in Docket RM-11287.

We urge the Commission to *add* a power ceiling increase for Part 15 AM stations to the other provisions of its coming proposed rule to establish LPAM.

## Conclusion

The Members of RADIO READY TO GROW urge the Commission to *keep the process moving* -- toward a workable proposed rule, and later a workable final rule, that provides equity for all and insulation from accountability for none.



Respectfully submitted,

Frank Hansche

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Dated: November 17, 2005